

**UNITED STATES DISTRICT COURT  
DISTRICT OF VERMONT**

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Nilay Kamal Patel and Rachel A. Gladstone,

Court File No. 5:20-cv-00061-gwc

Plaintiffs,

v.

University of Vermont and State Agricultural  
College,

**DEFENDANT’S MOTION TO DISMISS  
PLAINTIFFS’ COMPLAINT FOR LACK  
OF SUBJECT MATTER JURISDICTION**

Defendant.

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Defendant University of Vermont and State Agricultural College hereby moves the United States District Court, District of Vermont for an Order Dismissing Plaintiffs’ Complaint for lack of subject matter jurisdiction.

Defendant’s motion is based upon Plaintiffs’ Complaint, the documents necessarily embraced therein, the Court’s prior orders in this action, Defendant’s Memorandum of Law in Support of its Motion to Dismiss, the Declarations of Marie Johnson and Kim Howard in support of Defendant’s Motion, and the exhibits attached thereto.

Dated: April 23, 2021

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